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August 22, 2017

Honorable Jacqueline Scott Corley
United States District Court
Northern District of California
450 Golden Gate Avenue
Courtroom F - 15th Floor
San Francisco, CA 94102

Re: *Waymo LLC v. Uber Technologies, Inc., et al.*, Case No. 3:17-cv-00939-WHA
Lior Ron's Request for Clarification of Dkt. 1295

Dear Judge Corley:

We write to seek clarification of your Order today (Dkt. 1295), which granted Mr. Ron's August 22, 2017 letter request (Dkt. 1288). That letter requested alternative forms of relief—either to grant leave to file a motion for reconsideration or for the Court to directly grant reconsideration of its earlier order. It is unclear to Mr. Ron, the parties, and the Special Master which form of relief was granted in the Court's order. We raised this issue with counsel for the parties and the Special Master on a telephone call at 9:30 AM today, and the parties and Master Cooper agreed that this letter request for clarification was the best course of action.

Mr. Ron has prepared a proposed order, filed herewith, to address the issue. The proposed order grants reconsideration of the Court's August 22, 2017 Order (Dkt. 1287) and permits Mr. Ron's deposition to be taken after the close of fact discovery on the same terms and conditions as was set forth in that Order with respect to other depositions.

To the extent the Court's Order today was intended to grant Mr. Ron leave to move for reconsideration, Mr. Ron respectfully requests that the Court nonetheless enter the attached proposed order directly granting reconsideration because no party opposes the requested relief and the interests of certainty and judicial economy counsel in favor of resolving the issue directly.

Of course, should the Court wish for Mr. Ron to file a motion for reconsideration, he would do so promptly. But, barring such a request from the Court, Mr. Ron incorporates by reference his rationale for this request, filed at Dkt. 1288—namely, that he, like Mr. Kalanick, has already been deposed once in this case.

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Based on the foregoing, Mr. Ron respectfully requests that the Court enter the accompanying proposed order.

Respectfully submitted,

/s/ Jonathan A. Patchen

Jonathan A. Patchen

cc: Counsel of record (via ECF); Special Master John Cooper